

*Reply to:*  
Paul Thanasides  
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March 10, 2023

**VIA ECF ONLY**

Hon. Brian M. Cogan, U.S.D.J.  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Full Circle United, LLC v. Bay Tek Entertainment, Inc.*, No. 1:20-cv-03395-BMC

Dear Judge Cogan,

We write, as counsel for Plaintiff-Counterclaim Defendant Full Circle United, LLC and Counterclaim Defendant Eric Pavony (together, “FCU”), to request a one-week extension of time, from March 15 to March 22, 2023, to file response papers to Bay Tek Entertainment, Inc.’s (“Bay Tek”) Motion for Summary Judgment (“MSJ”). This is FCU’s third request for such an extension, the first two of which were granted. Bay Tek consents to this request, so long as it is acceptable to the Court.

FCU’s counsel continues to be impacted by the death of a partner at McIntyre Thanasides Bringgold Elliott Grimaldi Guito & Matthews, P.A. A serious Covid-19 infection required undersigned counsel to isolate in February, further delaying the ability to bring that partner’s practice up to speed and hampering FCU’s counsel’s work on replying to Bay Tek’s MSJ. Because of this, undersigned was unable to step in and devote time to assist in finalizing FCU’s opposition when another member of FCU’s counsel needed to care for her sick child in the last week.

Accordingly, FCU, through undersigned counsel, respectfully requests a final extension, of an additional 7 days, to respond to the Motion, until March 22, 2023. We thank Your Honor for your consideration of this matter.

Respectfully submitted,

/s/ Paul Thanasides  
Paul Thanasides

